

December 13, 2005

**VIA ELECTRONIC FILING**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
The Portals  
445 12th Street, S.W.  
Washington, D.C. 20554

RE: Updated Compliance Letter of Midwest Wireless Holdings L.L.C.  
**WC Docket No. 05-196**

Dear Ms. Dortch:

Midwest Wireless Holdings L.L.C. ("Midwest Wireless"), in response to the Commission's June 3, 2005, VoIP E911 Order ("Order") and the Public Notice issued by the Enforcement Bureau on November 7, 2005 ("Public Notice"), submits this supplement to its November 28, 2005, Compliance Letter in order to advise the Commission of the status and ongoing efforts of Midwest Wireless to comply with Commission Rule 9.5(e). Despite its substantial prior efforts to attain 100% compliance with the Order, Midwest Wireless seeks a further limited extension of the Order's requirements.

By way of background, Midwest Wireless is a CMRS provider operating under FCC authority in the rural areas of Southern Minnesota, Iowa and Western Wisconsin. Midwest Wireless currently holds the CMRS license in primarily rural areas: Minnesota RSAs 7 – 10; the Rochester, MN MSA; Iowa RSAs 3, 6, 11-16; and Wisconsin RSA 5. (the "Midwest Footprint"). Within the Midwest Wireless Footprint, Midwest Wireless recently began utilizing Voice over Internet Protocol ("VoIP") technology in order to offer its wireless subscribers an integrated service feature to be used in connection with their wireless device. The use of VoIP technology allows Midwest Wireless to offer its subscribers the use of a VoIP enabled home or office phone in connection with the wireless device. The subscriber utilizes only one phone number, one voicemail, etc. This VoIP service feature offering is branded oneWave. It is important to note that Midwest Wireless only markets to, and accepts, oneWave subscribers who identify a Principal Place of Use ("PPU") within the Midwest Footprint.

In September 2005, Midwest Wireless entered into a definitive agreement with Intrado, Inc. ("Intrado") to provide a VoIP V-9-1-1 Mobility Services Solution. Pursuant to the Parties' agreement, Intrado was obligated to provide a V911 service that supports and adheres to the requirements of the Order ("the Service") within the Midwest Footprint and selected MSAs by November 28, 2005. The contractual obligation to provide the Service within the Midwest Footprint essentially escalates the connectivity Intrado had otherwise

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planned to deploy to the rural subscribers of Midwest Wireless by approximately 4 months. (Pursuant to the Intrado Major Market Rollout Schedule, the geographical area covered by the Midwest Footprint, was not scheduled to be deployed by Intrado until March 31, 2006).

Currently, Midwest Wireless is able to transmit the requisite ANI and Registered Location Information for approximately 92% of subscriber lines to the appropriate PSAP within the Midwest Wireless Footprint. The largest outstanding issue remains the ability of the individual PSAP CPE to correctly display the transmitted ALI data. Testing by Midwest Wireless and Intrado has demonstrated that the data stream transmitted is correct, however the PSAP CPE is incorrectly displaying the ALI data. Midwest Wireless is now endeavoring to work with each individual PSAP within the Midwest Footprint in order to test, and if necessary, suggest and/or make appropriate changes to the PSAP CPE. (Please see attached Intrado correspondence dated December 9, 2005, for further clarification).

Midwest Wireless has worked diligently with Intrado, and other third-parties, in order to provide Service to its rural subscribers consistent with the Order. By partnering with Intrado to provide unique solutions and technically innovative alternatives, Midwest Wireless has enabled its rural subscribers to have V911 Service capability well ahead of the schedule initially propounded by Intrado. Accordingly, Midwest Wireless respectfully requests a limited extension, until such time as appropriate testing with individual PSAPs is successfully completed. Based upon the representations of Intrado, Midwest Wireless believes such testing will be completed by December 21, 2005. Midwest Wireless will continue to provide the Commission with regular status updates and reports when appropriate.

I thank you for your attention to this matter.

Respectfully submitted,

Sean R. Simpson

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**VERIFICATION**

I, Sean R. Simpson, state that I am the Director of Legal & Regulatory Affairs for Midwest Wireless Holdings L.L.C.; that I am authorized to submit this report on behalf of Midwest Wireless Holdings L.L.C.; that the foregoing filing was prepared under my direction and supervision; and I declare under penalty of perjury that this report is true and correct to the best of my knowledge, information, and belief.

/s Sean Simpson

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